UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

RASHID JAHM, pro se,)
Plaintiff,) CASE NO. 05-CV-11638-JLT
v.) HON. JOSEPH L. TAURO
DENNIS D. LIEBER, et al,)
Defendants.)
)

<u>DEFENDANT GREAT AMERICAN INSURANCE COMPANIES'</u> <u>MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(6)</u>

The Defendant, Great American insurance Companies ("Great American"), hereby moves to dismiss plaintiff's claims pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim upon which relief can be granted. In support of its motion, Great American relies upon its Brief in Support filed herewith.

WHEREFORE, the defendant Great American hereby moves to dismiss plaintiff's claims against it for failure to state a claim upon which relief can be granted. The

defendant further moves that it be awarded its attorneys' fees and costs and such other relief as this Court deems just and proper.

> The Defendant, GREAT AMERICAN INSURANCE COMPANIES By its Attorneys,

ADLER POLLOCK & SHEEHAN P.C.

/s/ Patrick T. Voke

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 27, 2006.

> /s/ Patrick T. Voke Patrick T. Voke

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